

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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	:	
<i>In re</i>	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO,	:	(Jointly Administered)
<i>et al.</i> ,	:	
	:	
Debtors. <sup>1</sup>	:	
	:	
-----	X	
	:	
<i>In re</i>	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	
	:	Case No. 17-BK-04780-LTS
PUERTO RICO ELECTRICAL POWER	:	
AUTHORITY (PREPA),	:	<b>Court Filing Relates Only to PREPA</b>
	:	
Debtor.	:	
-----	X	

**[PROPOSED] ORDER GRANTING URGENT MOTION OF SOLUS TO FILE  
UNDER SEAL UNREDACTED MOTION TO COMPEL TESTIMONY  
PURSUANT TO RULE 30(b)(6) FROM U.S. BANK IN CONNECTION WITH  
PREPA RSA SETTLEMENT MOTION**

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<sup>1</sup> The Debtors in these title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

Upon consideration of the *Urgent Motion of Solus to File Under Seal Unredacted Motion to Compel Testimony Pursuant to Rule 30(b)(6) from U.S. Bank in Connection with PREPA RSA Settlement Motion* (the “Motion to Seal”), filed on July 16, 2019, and it appearing that (i) the Court has jurisdiction to consider the Motion to Seal and the relief requested therein pursuant to section 310 of the Puerto Rico Oversight, Management and Economic Stability Act (“PROMESA”); (ii) venue of this proceeding and the Motion to Seal is proper pursuant to section 307 of PROMESA; (iii) notice of the Motion to Seal was adequate and proper under the circumstances and no further or other notice need be given; and (iv) based on the statements made in the Motion to Seal, the Court finds that it is appropriate for Solus to file under seal an unredacted version of the *Motion of Solus to Compel Testimony Pursuant to Rule 30(b)(6) from U.S. Bank in Connection with PREPA RSA Settlement Motion* [Docket No. 1469] (the “Motion”) and Exhibit C attached thereto,

IT IS HEREBY ORDERED THAT:

1. The Motion to Seal is GRANTED.
2. Solus is entitled to file a full and unredacted version of the Motion and the attached Exhibit C under seal.
3. The Clerk of Court will provide Solus and all other parties entitled to service in these proceedings access to the sealed materials through their counsel of record.
4. This Order is without prejudice to the rights of any party in interest to seek to unseal the documents or any part thereof.

Dated \_\_\_\_\_, 2019

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Honorable Judith G. Dein  
United States Magistrate Judge